

## Attachment 1

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF OKLAHOMA**

**VANCE DOTSON,** )  
Plaintiff, )  
v. ) Case No.  
**EXPERIAN INFORMATION SOLUTIONS,** )  
**INC.,** )  
**Defendants.** )

## **DECLARATION OF VANCE DOTSON**

I, Vance Dotson, declare under penalty of perjury as follows:

1. I am over the age of 18 and competent to testify to the matters stated herein. All facts set forth in this declaration are based on my personal knowledge.
2. I am the Plaintiff in this action. I submit this sworn declaration in support of my Complaint and in support of the attached Exhibits A, B, C, D and E.
3. On February 6, 2025, I submitted a request to Experian through AnnualCreditReport.com for a full copy of my consumer file disclosure.
4. In response, Experian provided me with a file disclosure identified by Report number 0553-3069-46. That disclosure included partial account number and the information was incomplete. Specifically, it omitted the full account number, social security numbers of mine (SSN Variarion) and key data fields,

including payment history, balances, account status, high credit limits, and other essential identifying information. As a result, I was left deeply confused and forced into the role of a detective, trying to piece together incomplete data in an attempt to determine whether the account was accurate, complete or legitimately associated with me.

5. Because the account number and critical data fields were incomplete, truncated, or missing altogether, I was unable to determine whether account was legitimate or whether it contained any inaccuracies. This lack of information made it impossible for me to take the necessary steps to investigate, evaluate, or properly dispute the account as required under the Fair Credit Reporting Act.

6. As a direct result of Experian failure to provide a full and complete disclosure as required by 15 U.S.C. § 1681g(a)(1), I suffered concrete informational harm and emotional distress.

7. The uncertainty about what was in my file and what Experian might be reporting about me to third parties such as lenders, landlords, or employers caused me constant anxiety. I could not verify the legitimacy of the account, which made me feel exposed and defenseless.

8. I experienced difficulty sleeping, recurring anxiety, loss of concentration, and intrusive thoughts about being denied credit, housing, or employment. I became withdrawn from social activities and lost motivation in my daily life. My sense of control over my financial future was completely shaken as a result of Experian failure to provide me with all of the information it maintained about me. This emotional distress

was directly tied to my inability to determine what was being reported about me and whether the account information was accurate or legitimate.

9. I developed symptoms of depression, weight gain, weight lost, including low mood, hopelessness, and chronic stress. The fear that I might be misjudged by others based on inaccurate or incomplete data reported by Experian affected me deeply.

10. What made this experience even more distressing was the fact that Experian had sent me a Summary of Rights, attached as Exhibit A and B, which explicitly stated in writing that I was entitled to “all information” in my file. Despite that written assurance, Experian deliberately withheld the very information it claimed I had a right to receive. This contradiction left me feeling betrayed and disrespected, and it significantly intensified my emotional distress.

11. This contradiction made me feel betrayed, disrespected, and furious. I trusted that Experian would act in accordance with federal law, and instead I was left confused and frustrated. Their failure to uphold their own statements intensified my emotional suffering.

12. I also experienced significant practical harm. I had to spend hours reviewing the incomplete disclosure, trying to decipher whether the accounts had inaccuracies, what information was missing, and how I could obtain the data I was legally entitled to receive. I researched consumer rights resources, reviewed my personal records, and prepared legal documentation, all of which became necessary solely because Experian failed to provide the full data they were required to disclose in the first place. These efforts resulted in unnecessary stress, wasted time, and procedural burdens that

could have been avoided had Experian simply complied with my lawful request made on February 6, 2025.

13. I feel that my time and energy were completely wasted. I should not have had to chase down basic account information that Experian already had and was obligated by law to provide. Instead of receiving a transparent and complete file, I was forced into a time-consuming and emotionally exhausting guessing game.

14. This time loss was not trivial. It interfered with my ability to focus on work and personal responsibilities. I felt like my efforts to protect my credit and financial reputation were being deliberately undermined by a company that claimed to protect consumers.

15. If Experian had disclosed the full account number and all related data fields as required by § 1681g, I would have promptly reviewed and disputed any errors. Their failure obstructed my ability to protect myself and caused both emotional and procedural harm.

16. I affirm that the copy of my February 6, 2025 consumer file disclosure, attached as Exhibit A, is a true and accurate copy of what I received from Experian.

17. I also affirm that the Summary of Rights, attached as Exhibit A and B, is a true and accurate copy of what was included with that disclosure.

18. Experian had the ability to provide all of the information it maintained about me, including the full, accurate, and complete account number, as well as the full payment history, balance information, past due status, amount paid, scheduled payment section, and remarks section. Despite having this information in its

possession at the time I submitted my request on February 6, 2025, Experian chose to leave these details omitted from my disclosure. This omission was not due to a lack of data but was a deliberate decision to withhold information that I was legally entitled to receive under the Fair Credit Reporting Act.

19. I believe Experian's actions were not merely negligent. I believe they were willful and reckless. Experian knowingly withheld information in a manner that I believe was intended to harm me and to prevent me from obtaining a full, accurate, and complete picture of the information it prepared and maintained about me in its files. Their failure to disclose this information appears deliberate and calculated, especially given that they acknowledged in writing that I was entitled to receive all information in my file.

**I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.**

Executed on this 3rd day of June, 2025.

Vance Dotson

**Vance Dotson**

Plaintiff